

Office of the Sheriff

Commitment to Excellence



Dan Starry Sheriff

Brian R. Mueller Chief Deputy

12/20/2018

Ms. Marlene H Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Dear Ms. Dortch:

I am writing to oppose proceedings 18-295 and 17-183, which propose to open the 6ghz microwave band to unlicensed devices. I was very alarmed to learn of these proposals. I am also surprised that the FCC is so callously disregarding the public's safety. This band contains many microwave links that are absolutely essential to public safety radio systems, such as the one I maintain.

I manage the radio system for the Washington County Sheriff's Office in Minnesota. Washington County is suburban area on the east side of the Twin Cities. We are approximately 423 square miles and a population around 260,000 residents. Our radio system is shared with all county law enforcement, fire, EMS, and public works agencies in addition to many State and Federal agencies.

Our radio system is imperative for public safety and is used for all matters of critical functions, such as dispatching calls for service, managing snow plowing during severe storms, coordinating tactics at active shooter events, and activating severe weather sirens for tornadoes.

My office manages eleven microwave links that connect the radio towers on the county owned radio system. Seven (7) of those links are in the 6ghz band, which I have learned is being considered for unlicensed use. The interference from these unlicensed systems has potential to interfere with the critical links that bring data out to our towers and in from our field users. The loss of a link due to interference and subsequent site disconnect could put our public and first responder's lives at risk.

I have concerns that even if the FCC required licensing for WiFi services in this band, the public will not comply with the rules and deploy equipment without concern to licensed services. These illegal and/or interfering signals will be time consuming for us to track down. I object to allowing any unlicensed and uncoordinated use of these microwave bands.

If the commission should proceed with this proposal, Automatic Frequency Control (AFC) looks to be a helpful tool to prevent unlicensed devices from interfering with our critical microwave systems.

If the FCC allows unlicensed use of 5925-6425 MHz and 6525-6875 MHz I urge the commission to mandate AFC technology in the devices that use those frequencies. Analysis by the Fixed Wireless Communications Commission proves AFC is needed regardless of power level or location of the unlicensed devices.

It is also important that the database used for AFC systems is accurate and up to date before the unlicensed device can be installed. This database will be invaluable for when (not if) we need to track down interference to keep our critical public safety system operational.

Please carefully review the data provided by the Fixed Wireless Communications Commission regarding the need to ensure fixed link adjacent channels are fully protected. *Lives depend on this.*

Respectfully Submitted,

Nathan Timm Badge #978

Radio System Manager

Washington County Sheriff's Office

Stillwater, MN